

Benard V. Preziosi, Jr. (BP - 5715)
CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP
101 Park Avenue
New York, NY 10178
Tel: (212) 696-6000
Fax: (212) 697-1559
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
INVISTA B.V., et al.

Plaintiffs,

v.

E.I. DU PONT DE NEMOURS AND COMPANY,

Defendant.
-----X

08 CV 3063 (SHS)
**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

RECEIVED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
APR 30 2008

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District

Courts for the Southern and Eastern Districts of New York, I, Benard V. Preziosi, Jr., a member
in good standing of the Bar of this Court, hereby move for an Order allowing the admission pro
hac vice of

Kristin S. Westgard
Litigation Department
Koch Industries Inc.
4111 E. 37th Street North
Wichita, KS 67220
Phone Number: (316) 828-7924
Fax Number: (316) 828-8862

649437825
APR 30 2008

Kristin S. Westgard is a member in good standing of the Bars of the States of Minnesota, Wisconsin and Kansas. There are no pending disciplinary proceedings against Kristin S. Westgard in any State or Federal court.

Dated: April 30, 2008
New York, New York

Respectfully submitted,



Benard V. Preziosi, Jr. (BP-5715)
Curtis, Mallet-Prevost, Colt & Mosle LLP
101 Park Avenue
New York, New York 10178
Phone: (212) 696-6198
Fax: (212) 697-1559

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X		
	:	
INVISTA B.V., et al.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	08 CV 3063 (SHS)
	:	AFFIDAVIT OF
	:	BENARD V. PREZIOSI
	:	IN SUPPORT OF MOTION
E.I. DU PONT DE NEMOURS AND COMPANY,	:	TO ADMIT COUNSEL
	:	<u>PRO HAC VICE</u>
Defendant.	:	
	:	
-----X		

STATE OF NEW YORK)
) SS:
COUNTY OF NEW YORK)

BENARD V. PREZIOSI, being duly sworn, hereby deposes and says:

1. I am a member of the firm Curtis, Mallet-Prevost, Colt & Mosle LLP, counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Kristin S. Westgard as counsel pro hac vice to represent Plaintiffs in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law on June 1, 1983. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Kristin S. Westgard is Senior Counsel of Litigation and Compliance at Koch Industries Inc. in Wichita, Kansas. Ms. Westgard is a member in good standing of the Bars of the States Minnesota, Wisconsin and Kansas. (Certified copies of Ms. Westgard's certificates of good standing are annexed hereto as Exhibit A, Exhibit B and Exhibit C).

4. I have been working with Ms. Westgard in connection with this matter and have found her to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.


5. Accordingly, I am pleased to move for the admission of Ms. Westgard, pro hac vice.

6. I respectfully submit a proposed order granting the admission of Ms. Westgard, pro hac vice, which is attached hereto as Exhibit D.


WHEREFORE it is respectfully requested that the motion to admit Kristin S. Westgard pro hac vice, to represent Plaintiffs in the above-captioned matter, be granted.

Dated: April 30, 2008
New York, New York

Respectfully submitted,


Benard V. Preziosi, Jr. (BP-5715)

Sworn to before me on April 30, 2008


NOTARY PUBLIC

JACQUELINE T. DIMARCO
Notary Public, State of New York
No. 31-4841199
Qualified in New York County
Commission Expires Oct. 31, 2009

EXHIBIT A

STATE OF MINNESOTA IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

KRISTIN SOLVEIG WESTGARD

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 25, 1996

Given under my hand and seal of this court on

April 14, 2008



Fredrick K. Grittner

Fredrick K. Grittner
Clerk of Appellate Courts

EXHIBIT B



David R. Schanker
Clerk

WISCONSIN SUPREME COURT

OFFICE OF THE CLERK

110 E. Main Street, Suite 215

P.O. Box 1688

Madison, WI 53701-1688

Telephone: 608-266-1880

TTY: 800-947-3529

Fax: 608-267-0640

<http://www.wicourts.gov>

CERTIFICATE OF GOOD STANDING

I, David R. Schanker, Clerk of the Supreme Court of Wisconsin certify that the records of this office show that:

KRISTIN S. WESTGARD

was admitted to practice as an attorney within this state on June 18, 1996 and is presently in good standing in this court.

Dated: April 16, 2008

A handwritten signature in black ink, appearing to read "DRS", followed by a horizontal line.

DAVID R. SCHANKER
Clerk of Supreme Court

EXHIBIT C

The Supreme Court of Kansas



Certificate of Good Standing

I, **Carol G. Green**, Clerk of the Supreme Court of the State of Kansas, do hereby certify that the Supreme Court of Kansas is the highest court of law, and the court of last resort within the State of Kansas, and has exclusive jurisdiction over and control of the admission of applicants to the bar of this state.

I do further certify that on October 13, 2006,

KRISTIN SOLVEIG WESTGARD

was duly admitted to practice as an attorney and counselor of the Supreme Court and all other courts of the State of Kansas and is, on the date indicated below, a member in good standing of the Kansas Bar.

ACTIVE STATUS

Witness my hand and the seal of the Supreme Court, hereto affixed at my office in Topeka, Kansas, this 7TH day of April, 2008.

Carol G. Green
Clerk of the Supreme Court of Kansas

EXHIBIT D

Benard V. Preziosi, Jr. (BP-5715)
CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP
101 Park Avenue
New York, NY 10178
Tel: (212) 696-6000
Fax: (212) 697-1559
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X		
INVISTA B.V., et al.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	08 CV 3063 (SHS)
	:	ORDER FOR ADMISSION
E.I. DU PONT DE NEMOURS AND COMPANY,	:	PRO HAC VICE
	:	ON WRITTEN MOTION
Defendant.	:	
-----X		

Upon the motion of Benard V. Preziosi, Jr., attorney for Plaintiffs INVISTA B.V.
et al. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Kristin S. Westgard
Litigation Department
Koch Industries Inc.
4111 E. 37th Street North
Wichita, KS 67220
Phone Number: (316) 828-7924
Fax Number: (316) 828-8862
Email Address: Kristin.westgard@kochind.com

is admitted to practice pro hac vice as counsel for Plaintiffs in the above captioned case in the
United States District Court for the Southern District of New York. All attorneys appearing
before this Court are subject to the Local Rules of this Court, including the Rules governing

discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: _____, 2008
New York, New York

United States District /Magistrate Judge

AFFIDAVIT OF SERVICE BY HAND

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Daren Hunter, being duly sworn, deposes and says:

I am over the age of eighteen years and am not a party to this action.

On April 30, 2008, I served a copy of the attached Motion To Admit Counsel Pro

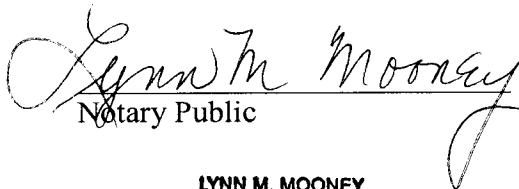
Hac Vice by hand upon:

Robert Jeffrey Dwyer
Boies Schiller & Flexner, LLP
575 Lexington Avenue
New York, New York 10022



DAREN HUNTER

Sworn to before me this
30th day of April, 2008


Notary Public

LYNN M. MOONEY
Notary Public, State of New York
No. 01MO4841073
Qualified in Queens County
Certificate Filed in New York County
Commission Expires June 30, 2011